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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

LUIS TRUJILLO,
v.
Plaintiff,

NO. CV-09-0265-FVS

**MIDLAND CREDIT
MANAGEMENT, INC., a Kansas
corporation.**

**JOINT STATUS
CERTIFICATE AND
PROPOSED DISCOVERY
PLAN**

Pursuant to CR 26(f) counsel of record for all parties conferred on

December 7, 2009 at 10:45 a.m. The following summarizes that conference.

1. Nature and Complexity of the Case. This is relatively simple case.

The Plaintiff alleges violations of the Fair Debt Collection Practices Act, and the

Washington Collection Agency Act and Consumer Protection Act. The

Defendant denies liability and asserts the bona fide error defense.

1 2. Possibility of Settlement. There is a realistic possibility of
2 settlement. Counsel agree to the use of a Magistrate for settlement purposes.
3

4 3. Initial Disclosures. Counsel agree to provide the Initial Disclosures
5 required by CR 26(a)(1) to opposing counsel by December 20, 2009.
6

7 4. Issues About Preserving Discoverable Information. Defendant will
8 provide Plaintiff's counsel with a hardcopy of its file on the Plaintiff, including
9 all applicable legends or glossaries needed to interpret the Plaintiff's file, by
10 December 30, 2009 and agrees to provide an electronic version of the same file.
11

12 5. Proposed Discovery Plan.

13 a. Initial Disclosures. Counsel agree to provide the Initial
14 Disclosures required by CR 26(a)(1) to opposing counsel by December 20,
15 2009.

16 b. Discovery Subjects and Timing. Counsel agree that
17 Plaintiff's deposition and the deposition of Defendant's corporate representative
18 will take place in late January, most likely in Wenatchee. Counsel further agree
19 that if any individual collector's deposition is required it will take place via the
20 telephone. Discovery should be completed by April 30, 2010.
21

22 c. Electronically Stored Information. Defendant will provide
23

Plaintiff's counsel with a hardcopy of its file on the Plaintiff, including all applicable legends or glossaries needed to interpret the Plaintiff's file, by December 30, 2009 and agrees to provide an electronic version of the same file.

d. Claims of Privilege. There are currently no issues surrounding claims of privilege.

e. Limitations on Discovery. Counsel agree that no changes in the limitations on discovery are required.

DATED this 8th day of December, 2009.

Fehr Law Office, PLLC

s/ Jeffrey T. Fehr
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Approved as to Form and Content:

Telephonically Approved by:

s/ Michael J. Beyer

MICHAEL J. BEYER, WSBA# 9109
Attorney for Defendant Midland
Credit Management, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on December 8, 2009, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

Michael J. Beyer
mjbeyer@sisna.com

s/ Jeffrey T. Fehr
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